

Fill in this information to identify the case:

United States Bankruptcy Court for the:

District of New Jersey
(State)

Case number (if known): _____ Chapter 7

☐ Check if this is an amended filing

Official Form 205

Involuntary Petition Against a Non-Individual

12/15

Use this form to begin a bankruptcy case against a non-individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against an individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed

1. Chapter of the Bankruptcy Code

Check one:

☒ Chapter 7

☐ Chapter 11

Part 2: Identify the Debtor

2. Debtor's name

Paradigm Elizabeth, LLC

3. Other names you know the debtor has used in the last 8 years

Include any assumed names, trade names, or doing business as names.

4. Debtor's federal Employer Identification Number (EIN)

☐ Unknown

4 5 - 4 8 8 4 1 9 8
EIN

5. Debtor's address

Principal place of business

581 & 631 Kapowski Rd.

Number Street

Elizabeth
City

NJ 07206
State ZIP Code

Union
County

Mailing address, if different

Attn: David Kushner
380 Lexington Avenue,

Number Street

Suite 2020
P.O. Box

New York NY 10168
City State ZIP Code

Location of principal assets, if different from principal place of business

Number Street

City State ZIP Code

Debtor Paradigm Elizabeth, LLC
Name

Case number (if known) _____

6. Debtor's website (URL) _____

7. Type of debtor

- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other type of debtor. Specify: _____

8. Type of debtor's business

Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☒ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☐ None of the types of business listed.
☐ Unknown type of business.

9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?

☒ No

☐ Yes. Debtor _____

Relationship _____

District _____ Date filed _____
MM / DD / YYYY

Case number, if known _____

Debtor _____

Relationship _____

District _____ Date filed _____
MM / DD / YYYY

Case number, if known _____

Part 3: Report About the Case

10. Venue

Check one:

- ☒ Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district.
☐ A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.

11. Allegations

Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).

The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).

At least one box must be checked:

- ☒ The debtor is generally not paying its debts as they become due, unless they are the subject of a bona fide dispute as to liability or amount.
☐ Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or an agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

12. Has there been a transfer of any claim against the debtor by or to any petitioner?

☒ No

☐ Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

Debtor Paradigm Elizabeth, LLC
Name

Case number (if known) _____

| 13. Each petitioner's claim | Name of petitioner | Nature of petitioner's claim | Amount of the claim above the value of any lien |
|-----------------------------|---|------------------------------|---|
| | <u>Zakim & Zakim</u> | <u>Legal Fees</u> | <u>\$ 79,338.67</u> |
| | <u>Norris McLaughlin & Marcus, P.A.</u> | <u>Legal Fees</u> | <u>\$ 194,097.36</u> |
| | <u>Kates Nussman</u> | <u>Legal Fees</u> | <u>\$ 539.89</u> |
| | <u>Miller-Rinaldi & Co.</u> | <u>Appraisal Fee</u> | <u>\$ 2,280.00</u> |
| | Total of petitioners' claims | | <u>\$ 276,255.92</u> |

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at the top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each additional petitioning creditor, the petitioner's claim, the petitioner's representative, and the petitioner's attorney. Include the statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

Part 4: Request for Relief

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

Petitioners or Petitioners' Representative

Name and mailing address of petitioner

Zakim & Zakim
Name
190 Moore Street, Suite 306
Number Street
Hackensack NJ 07601
City State ZIP Code

Name and mailing address of petitioner's representative, if any

Jack Zakim
Name
190 Moore Street, Suite 306
Number Street
Hackensack NJ 07601
City State ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/19/17
MM / DD / YYYY

X

Signature of petitioner or representative, including representative's title

Attorneys

Printed name _____
Firm name, if any _____
Number Street _____
City State ZIP Code _____
Contact phone _____ Email _____
Bar number _____
State _____
X _____
Signature of attorney _____
Date signed _____
MM / DD / YYYY

Debtor Paradigm Elizabeth, LLC
Name

Case number (if known) _____

Name and mailing address of petitioner

Norris McLaughlin & Marcus, P.A.

Name

400 Crossing Blvd., 8th Floor

Number Street

Bridgewater

NJ

08807

City

State

ZIP Code

Name and mailing address of petitioner's representative, if any

Morris S. Bauer

Name

400 Crossing Blvd, 8th Floor

Number Street

Bridgewater

NJ

08807

City

State

ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5/10/17

MM / DD / YYYY

X

Signature of petitioner or representative, including representative's title

Co-Counsel with petitioning law firm creditors
Morris S. Bauer, Esq.

Printed name

Norris McLaughlin & Marcus, P.A.

Firm name, if any

400 Crossing Blvd., 8th Floor

Number Street

Bridgewater

NJ

08807

City

State

ZIP Code

Contact phone 908-722-0700 Email mbauer@nmmlaw.com

Bar number 039711990

State New Jersey

X

Signature of attorney

Date signed 5/10/17

MM / DD / YYYY

Name and mailing address of petitioner

Kates Nussman Rapone

Name

190 Moore Street, Suite 306

Number Street

Hackensack

NJ

07601

City

State

ZIP Code

Name and mailing address of petitioner's representative, if any

Joel Ellis

Name

190 Moore Street, Suite 306

Number Street

Hackensack

NJ

07601

City

State

ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/11/17

MM / DD / YYYY

X

Signature of petitioner or representative, including representative's title

Printed name

Firm name, if any

Number Street

City

State

ZIP Code

Contact phone _____ Email _____

Bar number _____

State _____

X

Signature of attorney

Date signed _____

MM / DD / YYYY

Debtor

Paradigm Elizabeth LLC
Name

Case number (if known)

Name and mailing address of petitioner

Miller-Rinaldi & Co.
Name

1060 Main Street, Suite 203
Number Street

River Edge NJ 07661
City State ZIP Code

Name and mailing address of petitioner's representative, if any

Anthony Rinaldi
Name

1060 Main Street, Suite 203
Number Street

River Edge NJ 07661
City State ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4-9-17
MM / DD / YYYY

X

Signature of petitioner or representative, including representative's title

Printed name

Firm name, if any

Number Street

City State ZIP Code

Contact phone Email

Bar number

State

X

Signature of attorney

Date signed MM / DD / YYYY

Name and mailing address of petitioner

Name

Number Street

City State ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City State ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on MM / DD / YYYY

X

Signature of petitioner or representative, including representative's title

Printed name

Firm name, if any

Number Street

City State ZIP Code

Contact phone Email

Bar number

State

X

Signature of attorney

Date signed MM / DD / YYYY

**United States Bankruptcy Court
District of New Jersey**

In re Paradigm Elizabeth, LLC

Debtor(s)

Case No.

Chapter

7

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned co-counsel for the petitioning creditors in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

☒ None [Check if applicable]

May 10, 2017

Date



Morris S. Bauer, Esq.

Signature of Attorney or Litigant

Co- Counsel for **Petitioning Creditors**

Norris McLaughlin & Marcus, P.A.

400 Crossing Blvd

8th Floor

Bridgewater, NJ 08807

908-722-0700 Fax:908-722-0755

mbauer@nmmlaw.com